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## Policy Memorandum

**To:** Stakeholders and Interested Parties

**From:** Miles McEvoy, Deputy Administrator

**Subject:** Evaluation of Materials used in Organic Crop, Livestock and Handling Operations

**Date:** Original Issue Date – January 21, 2011

Organic producers and handlers must provide a complete list of substances used in production and handling within their Organic System Plan (OSP). This list includes fertilizers, soil amendments, potting soil, crop production aids, and pest control materials used in crop production; livestock feed, feed supplements, feed additives, medications, and livestock production aids used in livestock production; and ingredients, processing aids, post-harvest handling substances, sanitizers, and facility pest control materials used in processing and handling. Accredited certifying agents must evaluate this list to determine compliance with National Organic Program (NOP) regulations and communicate acceptance of the materials prior to the materials being used by the organic producers and handlers.

It is NOP policy to allow certifying agents to recognize reviews conducted by other certifying agents, the Environmental Protection Agency (EPA), and ISO Guide 65 accredited material evaluation programs reviewing products for compliance to NOP regulations. All accredited certifying agents must verify that materials used by certified organic operations comply with NOP regulations. Specifically, all materials must comply with the National List, and any annotations provided.

For branded (formulated) products, certifying agents have three options available for determining compliance:

1. Certifying agents can verify the product complies by evaluating the product and all of the ingredients within the product (e.g., contacting the supplier/formulator/manufacturer to obtain full disclosure of the ingredients in the product).
2. Certifying agents may consult with another certifying agent who has evaluated the product and accept that certifying agent's determination of the product's compliance with NOP regulations. The Washington State Department of Agriculture, as an accredited certifying agent, has a publicly available list of approved products available at <http://agr.wa.gov/FoodAnimal/Organic/MaterialsLists.aspx>



3. Certifying agents may consult with a reputable third party source (e.g., the EPA, the Organic Materials Review Institute (OMRI)) that evaluates the product's compliance with the NOP regulations, and accept their determination. OMRI has a publicly available list of approved products available at <http://www.omri.org/omri-lists>.

In all cases, documentation must accompany the resulting determination.

**Document Control:**

This document supersedes "Verification of Materials Memo" dated March 5, 2008, and "Documented Source of Approved & Prohibited Materials for Use in Organic Operations" dated July 16, 2004, which are now obsolete.